



INDEPENDENT CATTLEMEN'S ASSOCIATION OF TEXAS, INC.

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Docket No. 05-015-1
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

With regard to the Mandatory National Animal Identification Plan, the Independent Cattlemen's Association of Texas (ICA) recognizes the need to protect our industry from the spread of disease and the need to ensure our reputation for having a safe food supply. Due to the increasing threat of bio-terrorism, ICA also understands the necessity to protect the food supply and enhance our national security against such threats. With this increased surveillance will be challenges that the livestock industry will undoubtedly face. The Independent Cattlemen's Association of Texas would like to express our concerns about unresolved topics that we feel must be addressed before the plan moves to mandatory status.

Confidentiality must be the highest priority within the system to guarantee producer privacy and anonymity. A comprehensive confidentiality plan must be in place that ensures that information will only be distributed for national security reasons, and then only to the designated government agency.

All stakeholders (including all producer associations and organizations) directly involved in designing, administering and/or implementing The Plan should not profit in any way from the National ID Program.

While ICA supports the NAIS concept, it is concerned that the system must operate with a high degree of efficiency. Technology associated with the program should function in close proximity to 100% traceability in order to be able to track all movements of cattle throughout every sector, all the way to the final consumer product. Until the traceability functions at this rate, the status should be restricted to voluntary rather than mandatory.

Accountability within The Plan also must take precedence due to the nature of tracking transportation and trade from every level of production. The Plan should be uniform in nature and be effective across state and national borders, without uncertainty regarding rules and regulations. In addition to accountability, a concise definition and understanding of the enforcement of violations of The Plan must be addressed to each stakeholder involved. This should include a standard of penalties that acts as a guideline to authorities.

Because The Plan is in the beginning stages it is necessary to be able to redraft and amend the plan when issues warrant such action. The Plan should be drafted similar to a sunset provision which allows amendments to The Plan at set intervals to permit effective protocol changes.

In addition, to ensure that this program does not substantially cause a financial burden on any particular sector of the industry, an economic study that examines the costs associated with implementing The Plan should be performed. The analysis should include the implementation cost burden on producers, sale barn owners, feeder, packers and consumers. We fear the cost to sale barn operators would be so extensive that many would be forced out of business and would suffer economic adversity, as would the producers that also would bear these new costs.

If the Mandatory National Animal Identification Plan is reviewed and issues such as these described are considered, The Plan could be an advantage to the industry. The Independent Cattlemen's Association of Texas would support the National Animal Identification Plan if its members can be assured that the system would be implemented with the least impact possible to all segments of the beef industry.

Sincerely

A handwritten signature in cursive script, reading "Shane R. Sklar". The signature is written in dark ink and is positioned above the printed name.

Shane Sklar
Executive Director